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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THE BOARD OF TRUSTEES, in their
capacities as Trustees of the LABORERS
HEALTH AND WELFARE TRUST FUND
FOR NORTHERN CALIFORNIA;
LABORERS VACATION-HOLIDAY TRUST
FUND FOR NORTHERN CALIFORNIA;
LABORERS PENSION TRUST FUND FOR
NORTHERN CALIFORNIA; and LABORERS
TRAINING AND RETRAINING TRUST
FUND FOR NORTHERN CALIFORNIA,

Plaintiffs,

v.

GEO GROUT, INC.,

Defendant.

No. 13-04322-SI

**STIPULATION TO CONTINUE CASE
MANAGEMENT CONFERENCE;
~~[PROPOSED]~~ ORDER**

Pursuant to Civil Local Rules 7-12 and 16-2, Plaintiffs, The Board of Trustees, in their capacities as Trustees of the Laborers Health and Welfare Trust Fund for Northern California; Laborers Vacation-Holiday Trust Fund for Northern California; Laborers Pension Trust Fund for Northern California; and Laborers Training and Retraining Trust Fund for Northern California (hereinafter “Trust Funds” or “Plaintiffs”), by and through their undersigned counsel, and

1 Defendant, Geo Grout, Inc. (hereinafter referred to as "Defendant"), by and through the
2 undersigned counsel, hereby respectfully request that the Case Management Conference currently
3 scheduled for January 17, 2014 at 2:30pm be continued for 30 days.

4 The parties have been actively engaged in settlement negotiations in this matter, and are
5 finalizing a written settlement agreement. The parties are confident they will be able to fully
6 resolve this matter prior to any rescheduled Case Management Conference. Once the agreement
7 is finalized, the parties will submit a Notice of Settlement; any further dates may be vacated at
8 that time. Accordingly, the parties respectfully request that the January 17, 2014 Case
9 Management Conference be continued for thirty days.

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11 Dated: January 9, 2014

12
13 SIMPSON, GARRITY, INNES & JACUZZI
A Professional Corporation

14
15 By: /s/ Paul Simpson
PAUL SIMPSON
Attorneys for Defendant

16
17 Dated: January 9, 2014

18 WEINBERG, ROGER & ROSENFELD
A Professional Corporation

19
20 By: /s/ Daniel S. Brome
DANIEL S. BROME
Attorneys for Plaintiffs

[PROPOSED] ORDER

Based upon the foregoing Stipulation to Continue Case Management Conference, the Court orders the continuance of the January 14¹⁷, 2014 Case Management Conference for thirty (30) days, or as soon thereafter as a court date is available. In addition, the Court Orders: The initial case management conference is continued to Friday, Feb. 28, 2014.

Dated: 1/13/14



The Honorable Susan Illston
United States District Court Judge

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